

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff,

v.

**ANDREW CUOMO, both individually and in
his official capacity; MARIA T. VULLO, both
individually and in her official capacity; and
THE NEW YORK STATE DEPARTMENT
OF FINANCIAL SERVICES,**

Defendants.

NO. 18-CV-00566-TJM-CFH

**THE NATIONAL RIFLE ASSOCIATION OF AMERICA’S
RENEWED MOTION FOR THE ISSUANCE OF LETTERS OF REQUEST**

Plaintiff National Rifle Association of America (“NRA”), by its undersigned counsel of record, hereby renews its motion¹ (the “Motion”) pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (“Hague Evidence Convention”), 28 U.S.C. § 1781, Rule 28 of the Federal Rules of Civil Procedure, and the Evidence (Proceedings in Other Jurisdictions) Act 1975 c. 34, for the Court to issue Letters of Request for International Judicial Assistance to compel the production of documents by the Corporation of Lloyd’s (“Lloyd’s”), AmTrust Syndicates Limited, Argo Managing Agency Limited, Atrium Underwriters Limited, Brit Syndicates Limited, Canopus Managing Agents Limited, Chaucer Syndicates Limited, Liberty Managing Agents Limited, S.A. Meacock & Company Limited, Tokio Marine Kiln Syndicates Limited (collectively, the “Managing Agents”) and the deposition of the

¹ ECF No. 129.

following individuals: Inga Beale; Mark Cloutier; Jon Hancock; Charles Franks; and a representative from each of the Managing Agents.

In its Order dated March 6, 2020, this Court denied the NRA's Motion without prejudice to renewing it should Judge McAvoy grant the NRA's appeal of this Court's Order dated August 8, 2019.² On March 31, 2020, Judge McAvoy granted the NRA's appeal.³ On August 11, 2020, this Court granted the NRA's request to renew the Motion.⁴ Thus, the NRA hereby renews its Motion in accordance with this Court's direction.

In support of its renewed motion, the NRA relies on the accompanying memorandum of law, the papers previously filed in support of the Motion,⁵ all other pleadings and papers on file in this action, any matters of which this Court may take judicial notice, and such further evidence and argument as may be presented at or before the hearing on this matter.

² ECF No. 181.

³ ECF No. 188.

⁴ ECF No. 241.

⁵ ECF No. 129.

Date: August 17, 2020

Respectfully submitted,

By: /s/ Sarah B. Rogers
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**ATTORNEYS FOR THE NATIONAL
RIFLE ASSOCIATION OF AMERICA**

CERTIFICATE OF SERVICE

I certify that on August 17, 2020, I caused a copy of the foregoing to be served upon the following counsel electronically through the ECF system:

William A. Scott
Assistant Attorney General, Of Counsel
New York State Attorney General's Office
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ATTORNEYS FOR MARIA T. VULLO

/s/ Michelle J. Martin

Michelle J. Martin